



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 8, 2019

BY ECF

The Honorable Andrew L. Carter, Jr.
United States District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Reginald Fowler*, S1 19 Cr. 254 (ALC)

Dear Judge Carter:

The Government writes, with the consent of defense counsel, to request that the Court set bail conditions, including a bond, in the above-captioned matter. The defendant was arrested on April 30, 2019 in the District of Arizona. At that time, the Government and defense counsel agreed to adjourn a detention hearing so that the defendant could prepare a proposed bail package. The parties have agreed to a proposed bail package, set forth below, which includes a bond secured by multiple properties. In conversations with prosecutors in Arizona, the Government has learned that the United States District Court for the District of Arizona does not include secured bonds in bail packages. Consequently, the prosecutor handling the case in Arizona has requested that any such bond be entered in the Southern District of New York.

In light of these circumstances, the Government respectfully requests that the Court set the following bail terms for the defendant:

1. \$5 million personal recognizance bond, secured by two financially responsible co-signers and the following real property:
 - a. 3965 Bayamon Street, Las Vegas, Nevada
 - b. 8337 Brittany Harbor Drive, Las Vegas, Nevada
 - c. 4670 Slippery Rock Drive, Fort Worth, Texas
 - d. 4417 Chaparral Creek Drive, Fort Worth, Texas
 - e. 8821 Friendswood Drive, Fort Worth, Texas
2. Travel restricted to the Southern District of New York, the Eastern District of New York, and the District of Arizona, with additional domestic travel subject to approval by Pretrial Services ("PTS")

3. Surrender of all travel documents and no new applications
4. PTS supervision as directed by PTS
5. No new lines of credit without PTS approval

The parties also request that the time until the arraignment and initial conference be excluded in the interests of justice, under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), so that the defendant can review discovery, consider any potential motions, and engage in plea negotiations.

The Government has conferred with counsel for the defendant, who joins in all of the above requests.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By:



Jessica Fender / Sheb Swett / David Zhou
Assistant United States Attorneys
Southern District of New York
(212) 637-2276 / 6522 / 2438

cc: James G. McGovern, Esq. (by ECF)
Michael C. Hefter, Esq. (by ECF)